

1 **UNITED STATES DISTRICT COURT\nNORTHERN DISTRICT OF CALIFORNIA**

2
3 **Hang Zhang,**
4 *Plaintiff,*
5
6 **DANIEL DRISCOLL,**
7 **Secretary, Department of the Army,**
8 *Defendant*

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11 [PROPOSED] ORDER: MOTION FOR
12 PRELIMINARY INJUNCTION
13 (AFL-CIO v. OPM, No. 3:25-cv-01780-
14 WHA)

15 **[PROPOSED] ORDER**

16 Having considered Plaintiff's Motion for Preliminary Injunction and the supporting materials,
17 the Court GRANTS the motion and ORDERS as follows:

- 18 1. Enjoin issuance or reliance on any third marginal performance appraisal pending judicial
19 review;
- 20 2. Prohibit any removal or additional reassignment resulting from personnel schemes
21 traceable to OPM's realignment directive;
- 22 3. Independently review any future appraisal below pre-2023 levels before implementation;
- 23 4. Cease retaliatory actions and internal communications regarding Plaintiff's EEO
24 activities;
- 25 5. Submit for in-camera inspection all internal communications about Plaintiff's EEO
26 activity or appraisal processes;
- 27 6. Implement safeguards against unauthorized disclosure of Plaintiff's protected EEO
28 information;
7. Remove retaliatory or adverse annotations from Plaintiff's official personnel records;
8. Reinstate Plaintiff's rescinded January 30, 2025 award into her official file;

- 1 9. Require Defendants to file a compliance report within 30 days detailing implemented
- 2 remedial actions;
- 3 10. Retain jurisdiction for expedited hearing upon allegations of noncompliance.
- 4

5 IT IS SO ORDERED.

6 Dated: _____

7 THE HONORABLE WILLIAM H. ALSUP

8 UNITED STATES DISTRICT JUDGE